

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
THE UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	
)	
THE COMMONWEALTH OF)	
MASSACHUSETTS, et al.)	Civil Action No. 05-10112 JLT
)	
Defendants, and)	
)	
THE COALITION FOR BUZZARDS BAY,)	
)	
Intervenor-Defendant)	
_____)	
)	
THE AMERICAN WATERWAYS OPERATORS,)	
et al.)	
Intervenor-Plaintiff)	
)	
v.)	
)	
MITT ROMNEY, Governor of Massachusetts, et al.)	
)	
Defendants)	
_____)	

**UNOPPOSED JOINT MOTION TO ENLARGE TIME TO RESPOND TO THE
MOTIONS OF THE UNITED STATES AND THE INTERVENOR-PLAINTIFFS**

Defendant the Commonwealth of Massachusetts (the “Commonwealth”) and intervenor-defendant The Coalition for Buzzards Bay (“The Coalition”) (collectively, the “Defendants”), respectfully move for an enlargement of time, up to and including June 29, 2005, to respond to the United States’ Motions for Summary Judgment and for Judgment on the Pleadings, as well as to a motion or motions which the Defendants have been informed by counsel will be filed

imminently by the intervenor-plaintiffs the American Waterways Operators, International Association of Independent Tank Vessel Owners, Chamber of Shipping of America and BIMCO (the "Intervenor-Plaintiffs"). Responses to the United States' motions are currently due by June 6, 2005. Responses to the Intervenor-Plaintiffs' motion or motions would be due fourteen (14) days after service of the motion or motions, in accordance with Local Rule 7.1(B)(2).

In support of this Joint Motion, the Defendants state that, due to the number and complexity of the issues presented by the United States in its lengthy Motions, the Defendants require additional time to conduct appropriate research and prepare their responses. In addition, such additional time is required due to the press of other matters being handled by the Commonwealth's counsel.

For the foregoing reasons, the Commonwealth and The Coalition respectfully request that the Court enlarge their time for serving their responses in this matter up to, and including, June 29, 2005.

Respectfully submitted,

THOMAS F. REILLY
ATTORNEY GENERAL

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THE COALITION FOR BUZZARDS BAY

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Dated: June 2, 2005

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

I, Elisabeth M. DeLisle, hereby certify that I have conferred with counsel for the United States and counsel for the Intervenor-Plaintiffs regarding this Joint Motion pursuant to Local Rule 7.1(A)(2), and counsel for both the United States and the Intervenor-Plaintiffs have indicated their intent not to oppose the requested enlargement of time.

/s/ Elisabeth M. DeLisle